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13 *Attorneys for Movants Julie Poincenot,
14 Patrick Doolittle, Megan Van Mater Davidson
15 and Paul Lore*

16 UNITED STATES BANKRUPTCY COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 **In re:**

20 Case No. 19-30088 (DM)
21 Chapter 11
22 (Lead Case)

23 **PG&E CORPORATION
&
24 PACIFIC GAS AND ELECTRIC
25 COMPANY,**

26 **Debtors.**

27 Affects:
28 [] PG&E Corporation
[] Pacific Gas & Electric Company
[X] Both Debtors
**DECLARATION OF BRADFORD
BOWEN RE DOCUMENTS TO BE
FILED UNDER SEAL PURSUANT TO
COURT INSTRUCTIONS IN SUPPORT
OF MOTION TO STAY PROCEEDINGS
RE DISPUTED CLAIMS UNDER FIRE
VICTIM TRUST AGREEMENT**

29 * All papers shall be filed in the Lead
30 Case, No. 19-30088 (DM)

31 **Date: July 30, 2024**
32 **Time: 10:00 a.m.**
33 **Location: Telephone/Videoconference**
34 <https://www.canb.uscourts.gov/calendars>

35 In re PG&E Corporation & Pacific Gas and Electric Company, Chapter 11 Case No. 19-30088 (DM)
36 DECLARATION OF BRADFORD BOWEN RE DOCUMENTS TO BE FILED UNDER SEAL PURSUANT TO
37 COURT INSTRUCTIONS IN SUPPORT OF MOTION TO STAY PROCEEDINGS RE DISPUTED CLAIMS
38 UNDER THE FIRE VICTIM TRUST AGREEMENT & REVIEW OF FVT INTERPRETATION OF PLAN
39 LANGUAGE

1 I, Bradford Bowen, hereby declare as follows:
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3 1. I am an attorney at law duly licensed to practice before all courts in the State of
4 California and the Northern District of California and am an attorney with Danko Meredith, a
5 part of the Northern California Fire Lawyers, counsel of record for the movants Julie Poincenot,
6 Patrick Doolittle, Megan Van Mater Davidson, and Paul Lore (collectively, the Movants or
7 Claimants).

8 2. I am a custodian of the records and files of the Movants as they pertain to the
9 claims of each of the Movants. I have personally worked on the records and files related to this
matter.

10 3. All of the records, documents, and emails described herein below were made and
11 are maintained by our office in the ordinary course of its business and are currently under my
12 custody, or were received by our office from the Fire Victim Trust, or from the docket in this
13 matter, or in support of the claims.

14 4. All such records, documents, and emails described below are kept by our office in
15 the course of its regularly conducted business activities, and were made at or near the time by, or
16 from information transmitted by, an employee or agent with knowledge of the act, event,
17 condition or opinion and a duty to make such records, documents, and emails, or were received
18 from the Fire Victim Trust, or from the docket in this matter.

19 5. To the extent that I have personal knowledge of the facts set forth herein, I will
20 set forth said personal knowledge. To the extent that I do not have personal knowledge, then I
21 have gained such knowledge in the course and scope of my employment at Danko Meredith, by
22 reviewing the records, documents, and emails in this matter, and by reviewing the docket in this
23 matter.

24 6. If called upon to testify in this action as to the matters set forth in this declaration,
25 I could and would competently testify thereto.

26 7. In addition to the documents listed below that are being filed under seal, there are
27 approximately 3,000 pages of medical and financial records that were submitted to the FVT, and

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LANGUAGE

available to the Neutral in her evaluation of the case. I am not able to state which, if any, were examined by the Neutral, The Trustee, or her consultant. Due to the volume, sensitive nature of these documents, and the small likelihood that they would help with the pending motion, they are not being submitted at this time. They are available and compiled should they need to be filed in the future.

8. Pursuant to the Court’s express directive during the hearing on Movants’ Motion To Stay Proceedings Re Disputed Claims Under Fire Victim Trust Agreement And Review Of FVT Interpretation Of Plan Language, Docket No. 14 491 (“Motion”) on July 30, 2024, the Movants submit the following documents under seal:

- a. Determinations and Denials of LHON Claims, a true and correct copy of which is submitted under seal;
- b. Briefs and Research in Support of LHON Claims, a true and correct copy of which is submitted under seal;
- c. Expert Materials in Support of LHON Claims, a true and correct copy of which is submitted under seal;

If called upon to testify in this action as to the matters set forth in this declaration, I could and would competently testify thereto.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on August 2, 2024 at Redwood City, California.

Bradford L. W. Bowen

BRADFORD BOWEN

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12 **EXHIBITS FILED**
13 **UNDER SEAL**
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